



POLICY #: **HR11 TELECOMM 47 C.F.R 64.2009**

DATE CREATED: January 1, 2008
LAST DATE REVISED: January 1, 2010
POLICY: Safeguards required for use of Customer Proprietary Network Information (CPNI)
POLICY OWNER: Wendy Heinz
PURPOSE: Telecommunication Carriers must be compliant with FCC regulations regarding customer proprietary Network information.
RESPONSIBILITY: ALL SCS Employees

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Mailing Address
P.O. Box 1586
Gallup, NM 87305

Website
www.scsconnect.com

PROCEDURE:

SCS is a data carrier and as such we are subject to these **FCC Guidelines:**

1. **Carrier Authentication Requirements** SCS is prohibited from releasing a customer's phone call records when a customer calls the carrier except when the customer provides a password. If a customer does not provide a password, carriers may not release the customer's phone call records except by sending it to an address of record or by the carrier calling the customer at the telephone of record. SCS is required to provide mandatory password protection for online account access. SCS is permitted to provide all CPNI, including customer phone call records, to customers based on in-store contact with a valid photo ID.
2. **Notice to Customer of Account Changes.** SCS is required to notify the customer immediately when the following are created or changed: (1) a password; (2) a back-up for forgotten passwords; (3) an online account; or (4) the address of record.
3. **Notice of Unauthorized Disclosure of CPNI.** In the event of a CPNI breach, management must be notified immediately. Management must document carefully each situation and provide that to the owners. The owners will then notify the proper authorities.
4. **Joint Venture and Independent Contractor Use of CPNI.** Consent rules are modified to require SCS to obtain explicit consent from a customer before disclosing a customer's CPNI to any SCS joint venture partners or independent contractors for the purposes of marketing communications-related services to that customer.
5. **Annual CPNI Certification.** Certification rules are amended to require carriers to file with the Commission an annual certification, including an explanation of any actions taken against data brokers and a summary of all consumer complaints received in the previous year regarding the unauthorized release of CPNI.



I understand and accept the CPNI policy and acknowledge that I have been provided a copy by the management of SCSConnect.

Employee Signature

Employee Name (printed)

Date

Manager Signature

Manager Name (printed)

Date